

THE LAW FIRM OF
CÉSAR DE CASTRO, P.C.
ATTORNEY AT LAW

The District
111 Fulton Street - 602
New York, New York 10038
631.460.3951 Office
646.285.2077 Mobile
646.839.2682 Fax
cdecastro@cdecastrolaw.com
cdecastrolaw.com

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Via ECF

The Honorable Sidney H. Stein
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Menendez, et al.*, 23 Cr. 490 (SHS)

Dear Judge Stein,

We write to request an extension of time, until January 15, 2025, by which Mr. Daibes must submit his sentencing memorandum. By order entered September 23, 2024 (ECF No. 617), Mr. Daibes's sentencing memorandum is due Thursday, January 2, 2025, just short of four weeks before sentencing. As the Court is aware, the parties have been engaged in a comparison of the approximately 3,000 exhibits believed to be provided to the jury on a laptop computer during its deliberations, against the exhibits admitted at trial. That has resulted in several filings and many pages of briefing, the latest of which were filed today. The comparison process is ongoing, and we need additional time to complete our sentencing memorandum.

Accordingly, we respectfully request that the Court extend our time to file Mr. Daibes's sentencing memorandum until January 15, 2025.

Respectfully submitted,

/s/

César de Castro
Shannon McManus
Seth Agata
Valerie Gotlib

cc: All Counsel (*via* ECF)